

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
Dallas Division**

CHARLENE CARTER, §
§
Plaintiff, §
§
v. § Civil Case No. 3:17-cv-02278-X
§
SOUTHWEST AIRLINES CO., AND §
TRANSPORT WORKERS UNION OF §
AMERICA, §
LOCAL 556, §
§
Defendants. §

**DEFENDANT SOUTHWEST AIRLINES CO.'S APPENDIX IN SUPPORT OF MOTION
FOR SUMMARY JUDGMENT AND/OR PARTIAL SUMMARY JUDGMENT**

Exhibit	Document	Appendix Pages
1	Declaration of Paulo McKeeby; Exhibits A-B	APP. 1 – 17
2	Declaration of Mike Sims; Exhibit A	APP. 18 – 25
3	Michael Sims Deposition Excerpts (Nov. 2, 2020)	APP. 26 – 47
4	Ed Schneider Deposition Excerpts (Nov. 3, 2020)	APP. 48 – 109
5	Meggan Jones Deposition Excerpts (Nov. 4, 2020)	APP. 110 – 134
6	Maureen Emlet Deposition Excerpts (Nov. 5, 2020)	APP. 135 – 165
7	Denise Gutierrez Deposition Excerpts (Nov. 6, 2020)	APP. 166 – 171
8	Charlene Carter Deposition Excerpts (Nov. 20, 2020)	APP. 172 – 237
9	Audrey Stone Deposition Excerpts (Nov. 24, 2020)	APP. 238 – 256
10	John Parrott Deposition Excerpts (Nov. 30, 2020)	APP. 257 – 266
11	Jessica Parker Deposition Excerpts (Nov. 30, 2020)	APP. 267 – 275

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12	Lyn Montgomery Deposition Excerpts (Nov. 30, 2020)	APP. 276 – 280
13	Brandon Hillhouse Deposition Excerpts (Nov. 30, 2020)	APP. 281 – 287
14	Southwest Collective Bargaining Agreement	APP. 288 – 529
15	Transcript of Arbitration Proceedings	APP. 530 – 1002
16	Opinion and Award of Arbitrator William Lemons	APP. 1003 – 1021
17	Carter EEOC Charge Against Southwest	APP. 1022
18	Carter EEOC Charge Against Local 556	APP. 1023
19	Workplace Bullying and Hazing Policy	APP. 1024
20	Southwest Mission Statement	APP. 1025
21	Southwest Employee Social Media Policy	APP. 1026
22	Southwest Policy Concerning Harassment, Sexual Harassment, Discrimination & Retaliation	APP. 1027 – 1029
23	Read Before Fly – Jan. 11, 2013	APP. 1030
24	Read Before Fly – May 16, 2015	APP. 1031
25	Read Before Fly – Oct. 12, 2016	APP. 1032
26	Read Before Fly – Feb. 22, 2017	APP. 1033 – 1034
27	Inflight Info on the Go – Feb. 17, 2016	APP. 1035
28	Inflight Info on the Go – Jan. 20, 2017	APP. 1036
29	Carter Policy Acknowledgements	APP. 1037 – 1040
30	Carter Facebook Messages	APP. 1041 – 1138
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32	Assorted Correspondence and Facebook Posts	APP. 1144 – 1156
33	Carter Fact Finding Meeting Notes	APP. 1157 – 1174

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34	Stone Fact Finding Meeting Notes	APP. 1175 – 1179
35	Carter Termination Letter – Mar. 14, 2017	APP. 1180
36	Last Chance Agreement	APP. 1181 – 1186
37	Carter Step 2 Hearing Documents and Notes	APP. 1187 – 1352
38	Carter's Response to Interrogatory	APP. 1353 – 1359

Dated: September 2, 2021

Respectfully submitted,

/s/ Paulo B. McKeeby
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**ATTORNEYS FOR DEFENDANT
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document was filed via the Court's ECF filing system which caused a copy of same to be served on all parties on this 2nd day of September, 2021.

/s/ Paulo McKeeby
Paulo B. McKeeby